

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(1) Robert S. Dorsey II 43739-083 :
 (Name of Plaintiff) (Inmate Number) :

P.O. Box 699, Estill, SC 29918 :
 (Address) :

(2) _____ :
 (Name of Plaintiff) (Inmate Number) :

 (Address) :

(Each named party must be numbered,
 and all names must be printed or typed) :

United States of America
 vs.
 BOP Employees

(1) Rebecca Peters LPN :

(4) A. Foura-White Case Manager :

(2) K. Williams LPN :

(5) Mark Thompson Counselor :

(3) Brett Brosius HSA :

(Names of Defendants) :

(6) Al Farley Unit Manager :

(Each named party must be numbered,
 and all names must be printed or typed) :

3:19cv113
 (Case Number)

CIVIL COMPLAINT

FILED
SCRANTON

JAN 18 2019

PER [Signature]
 DEPUTY CLERK

TO BE FILED UNDER: 42 U.S.C. § 1983 - STATE OFFICIALS

 X 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

Yes, I have filed a previous suit. This lawsuit has not
been assigned a case number.

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? X Yes No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? X Yes No
- C. If your answer to "B" is Yes:
1. What steps did you take? Filed a BP-8, BP-9, BP-10 & BP-11
Filed to the Region office
 2. What was the result? Denied
- D. If your answer to "B" is No, explain why not: N/A

III. DEFENDANTS

United States of America (BOP Employees)

- (1) Name of first defendant: Rebecca Peters (4)A.Foura-White

Employed as LPN, (4)Case Manager at LSCI Allenwood

Mailing address: P.O. Box 1500, White Deer, PA 17887

- (2) Name of second defendant: K.Williams (5) Mark Thompson

Employed as LPN, (5)Counselor at LSCI Allenwood

Mailing address: P.O. Box 1500, White Deer, PA 17887

- (3) Name of third defendant: Brett Brosius (6)Al Farley

Employed as HSA, (6)Unit Manager at LSCI Allenwood

Mailing address: P.O. Box 1500, White Deer, PA 17887

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. Inmate Dorsey worked gatepass starting on 3/23/2016. This inmate has notified medical staff via e-mail. That I was missing my call-outs to Medical. Captain Dunkle at the time instructed staff that inmates are not to return for call-outs except for religious services. Inmate Dorsey missed Dental & Eye appointments along with other call-outs as a result of Dunkle's

2. instructions. Inmate Dorsey had 2 call-outs for an eye appointment. After being transferred to Estill, it was discovered that Inmate Dorsey had Diabetic Macular Edema. This can be confirmed via video surveillance and log books. Which contain the time of departure and arrival of inmates that exit and return to the Building. On April 18, 2016, staff lied and said I refused a retinopathy exam. Rebecca Peters and K. Williams, LPN names are on Form S358.060 which is a refusal form. These two staff members are BOP employees, so the proper defendant is the United States Government for violating thru Negligence as well as violation of Inmate's 8th amendment right against deliberate indifference.

RETALIATION

3. Inmate Dorsey went to unit team in September of 2016, for his six month review. After talking to case manager A. Fourra-White. I explained to her, I was not ready for a transfer. She told me that was good because I was doing a good job at the Training Center. Where I worked as an orderly. She would review me again in six months. I contacted the Health Services Administrator about missing my medical appointments and filed a BP-8. The HSA responded on the 6th of October. In his response, the HSA contradicted policy and said: I would have received an Incident Report if

V. RELIEF

(continued)

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. A proper investigation

2. Staff to be reprimanded (fired) for falsifying Government documents, and retaliating against inmate for filing administrative remedy, and obstructing justice

3. Monetary damages to be awarded to Inmate. (TBD)

\$5 million dollars for retaliation, violating policy, and
the Constitutional rights of this Inmate. This Inmate has
suffered emotional duress, mental anguish, and physical injury.

I missed any call-outs. Inwhich, I has missed several without any repercussions. I filed a BP-9, which was rejected for frivolous reasons. I gave Counselor Mark Thompson another BP-9 to turn in for me. Unit Team Al Farley put me in for a transfer as an act of retaliation for the Administrative Remedy I was pursuing. The form 409.051 will confirm that the transfer was put in for me on the same day 10/04/2016, I filed the BP-8. HSA Brosius never returned my BP-8 back to me. Case manager A.Foura-White, Counselor Mark Thompson, and Unit Manager Al Farley are all employees of the Bureau of Prisons thus making the United States Government the proper defendant. The results of the retaliation was this Inmate being transferred to a prison further from his home, a major wage reduction was also the result of the retaliation. Both an adverse action that being the result of the retaliation.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15th day of January, 20 19.

Robert S. Ory Jr.
(Signature of Plaintiff)

⇄43739-083⇄

Robert Dorsey II
Federal Prison camp
PO BOX #699
Estill, SC 29918
United States

CERT



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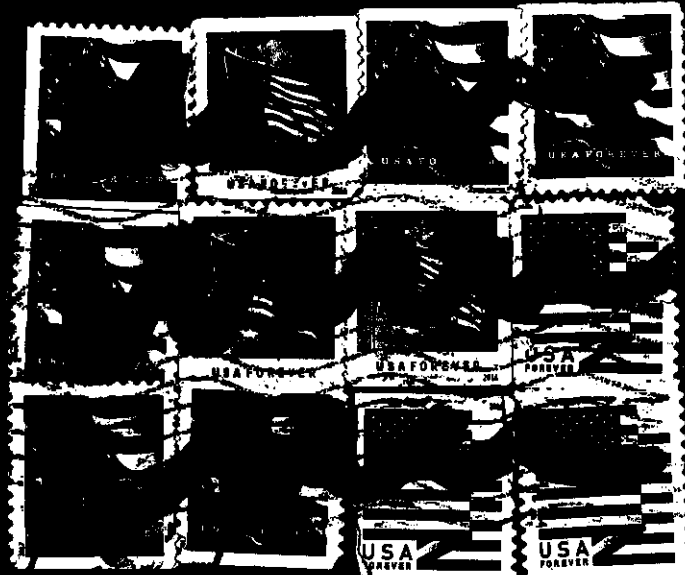
RECEIVED
SCRANTON

JAN 28 2019

DEPT. OF CORRECTIONS

⇄43739-083⇄

William J Ne
235 N Wash
po box 1148
Scranton, PA
United State

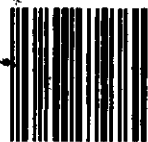


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